Renee Mazar
J.B.Poindexter and Company, Inc.
d.b.a Leer Midwest
58288 Ventura Drive
Elkhart, IN 46517-9497

Re: 039-13586
First Minor Permit Modification to:
Part 70 permit No.: T039-7561-00097

Dear Renee Mazar:

J.B.Poindexter and Company, Inc. d.b.a Leer Midwest was issued Part 70 operating permit T039-7561-00097 on March 22, 1999 for a fibreglass truck cap manufacturing plant. A letter requesting changes to this permit was received on April 1, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of addition of a new reactive injection molding unit to the existing plant.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
GS
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Greg Wingstorm
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

J. B. Poindexter & Company, Inc., dba Leer, Inc., dba Leer Midwest
58288 Ventura Drive and 28858 Ventura Drive
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7561-00097	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: March 22, 1999

First Minor Permit Modification: 039-13586	Pages affected: 6 Pages added: 37a, 37b, 44a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

(7) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

Plant 2: 58288 Ventura Drive

(8) One (1) hand application touch-up area, identified as B4, with a maximum capacity to coat 12.5 laminated parts per hour, exhausting to stacks PV1, PV2, and PV3.

(9) Two (2) HVLP coating booths, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, with B5 exhausting to stacks V13, V14, V15, and V16 and B6 exhausting to V17, V18, V19, and V20.

(10) One (1) fiberglass parts grinding operation, identified as Plant 2, with a maximum capacity to machine 384.5 pounds of fiberglass parts per hour, using dry filters to control particulate matter emissions, exhausting to stack BH-1.

Plant 3: 28858 Ventura Drive

(11) One (1) air-assisted airless laminating area, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.

(12) One (1) air-assisted airless gelcoating booth, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.

(13) One (1) final finish operation, identified as Mold and FF, with a maximum capacity of 0.05 fiberglass molds per hour.

(14) One (1) sanding operation, identified as Plant 3, with a maximum capacity to sand 50 pounds of fiberglass mold per hour, using a cloth filter to control particulate matter emissions, exhausting to stacks GV1 and GV2.

Plant 1: 58288 Ventura Drive

(15) one (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of Tonneau Caps at the rate of 10 units per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Plant 1: 58288 Ventura Drive

(1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(1) one (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of Tonneau Caps at the rate of 10 units per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities):

(a) The input of volatile organic compounds delivered to the reactive injection molding unit shall be limited, in total, to less than 25 tons per year rolled on a monthly basis. This will be equivalent to VOC emission of less than 25 tons per year.

(b) Any change or modification in the equipment covered in this permit which may increase the potential to emit to 25 tons VOC per year, shall require the approval of a Best Available Control Technology (BACT) plan, pursuant to 326 IAC 8-1-6, before such change may occur.

D.4.2 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control):

(a) Any change or modification in the equipment covered in this permit which may increase the potential to emit of single HAP and combination of HAPs to more than 10 tons and 25 tons per year respectively, shall require the approval of a Maximum Achieveable Control Technology (MACT) plan, pursuant to 326 IAC 2-4.1-1, before such change may occur.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limit specified in Conditions D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.4 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated at the end of each quarter based on the total volatile organic compound usage for the most recent 12 consecutive month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.5 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

(1) The amount and VOC content by weight of each resin used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.4.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP/HAPs usage limits and/or the HAP/HAPs emission limits established in Conditions D.4.2.

(1) The amount and HAP/HAPs content of each raw material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted HAP/HAPs content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total HAP/HAPs usage for each month; and

(6) The weight of HAP/HAPs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: J.B. Poindexter & Company, Inc., dba Leer, Inc., dba Leer Midwest
Source Address: 58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517
Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517
Part 70 Permit No.: T039-7561-00097
Facility: Reactive Injection Molding Unit
Parameter: Volatile Organic Compounds
Limit: less than 25 tons per 12 consecutive months period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**J. B. Poindexter & Company, Inc., dba Leer, Inc.,dba Leer Midwest**
Source Location:	**58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517**
County:	**Elkhart**
SIC Code:	**3792**
Operation Permit No.:	**T039-7561-00097**
Operation Permit Issuance Date:	**March 22, 1999**
First Minor Permit Modification No.:	**039-13586-00097**
Permit Reviewer:	**Gurinder Saini**

The Office of Air Management (OAM) has reviewed a modification application from J. B. Poindexter & Company, Inc., dba Leer, Inc.,dba Leer Midwest relating to the operation of reactive injection molding unit.

History

On April 01, 1999, J. B. Poindexter & Company, Inc., dba Leer, Inc.,dba Leer Midwest submitted an application to the OAM requesting to add a reactive injection molding unit to their existing plant. J. B. Poindexter & Company, Inc., dba Leer, Inc.,dba Leer Midwest was issued a Part 70 permit 039-7561 on March 22, 1999. The following new emission unit is to be added to the permit pursuant to minor source modification 039-10828 to Part 70 operating permit.

(a) one (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of Tonneau Caps at the rate of 10 units per hour.

Source Definition

This manufacturing and coating of fiberglass reinforced pickup truck caps and tonneau covers manufacturing plant consists of three (3) plants:

(1) Plant 1 and Plant 2 are located at 58288 Ventura Drive; and
(2) Plant 3 is located at 28858 Ventura Drive.

Since the three (3) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. For tracking purposes, these three (3) plants have been assigned Plant ID No. 039-00097.

Existing Approvals

The source was issued a Part 70 Operating Permit T039-7561-00097 on March 22, 1999. The source has since received the following:

(a) First Administrative Amendment No.: 039-11461, issued on February 08, 2000.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

There are no stacks associated with this equipment**.**

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 01, 1999. Additional information was received on May 19, 2000.

Emission Calculations

See Appendix A page 1 of 1 of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO_2	-
VOC	61.72
CO	-
NO_x	-
Combination of HAPs	negligible

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

The two resins that are mixed to form the injection molding product, contain at least 85% Dicyclopentadiene which is not a HAP substance. Hence this modification has negligible HAP emissions.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is more than 25 tons per year**.** The source has agreed to limit VOC emissions from this modification to less than 25 tons per year. Therefore, this source modification will be incorporated in the Part 70 Operating Permit as a Minor Permit Modification subject to the provisions of 326 IAC 2-7-12.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification to incorporate a minor source modification performed pursuant to 326 IAC 2-7-10.5 (d)(5). This modification is being performed pursuant to 326 IAC 2-7-12 (b)(1). The administrative amendment pursuant 326 IAC 2-7-11 (5) allows incorporation of any modification that have satisfied the requirements of 326 IAC 2-7-17 and 326 IAC 2-7-18. As the minor source modification did not have requirements of 326 IAC 2-7-17 and 326 IAC 2-7-18 applicable, therefore this modification is being performed under the next higher category that is minor permit modification.

Potential to Emit of modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
reactive injection molding unit	-	-	-	<25	-	-	neg.
Total	-	-	-	<25	-	-	neg.
PSD Significant	250	250	250	250	250	250	neg.

(a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

(b) The VOC emissions from reactive injection molding unit is limited to less than 25 tons/yr, therefore, 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities) requirements do not apply.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status **(attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)**
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the

formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Ozone County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities)

(a) Since the reactive injection molding process was constructed after January 1, 1980 and the potential to emit VOC from the mixing vessel is limited to less than 25 tons per year, the requirements of 326 IAC 8-1-6 does not apply. The input of volatile organic compounds delivered to the reactive injection molding process shall be limited, in total, to less than 25 tons per year rolled on monthly basis. This will be equivalent to VOC emission of less than 25 tons per year. Compliance with this limit for the injection molding process shall be determined based upon the following criteria:

Monthly usage by weight, monomer content for each resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each resin, and summing the emissions for all resins. Emission factors shall be based on the AP-42 document.

(b) Any change or modification in the equipment covered in this permit which may increase the potential to emit to 25 tons VOC per year, shall require the approval of a Best Available Control Technology (BACT) plan, pursuant to 326 IAC 8-1-6, before such change may occur.

326 IAC 2-4.1 (New Source Toxic Controls)

(a) Since the reactive injection molding process was constructed after July 27, 1997 and the potential to emit single HAP and combination of HAPs is less than 10 tons per year and 25 tons per year respectively, the requirements of 326 IAC 2-4.1 do not apply.

(b) Any change or modification in the equipment covered in this permit which may increase the single HAP or combinations HAPs potential to emit to 10 tons or 25 tons per year respectively, shall require the approval of a Maximum Available Control Technology (MACT) plan, pursuant to 326 IAC 2-4.1-1, before such change may occur.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Permit Changes

This modification will result in following changes in the permit language (deleted text is marked with ~~strikeout~~ and added is shown in **bold**):

1. A new emission unit is added to the section A.2 as (15) as follows:

   Plant 1: 58288 Ventura Drive

   (15) one (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of Tonneau Caps at the rate of 10 units per hour.

2. A new section D.4 is added as pages 37a, 37b as follows:

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(1) one (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of Tonneau Caps at the rate of 10 units per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities):

(a) The input volatile organic compounds delivered to the reactive injection molding unit shall be limited, in total, to less than 25 tons per year rolled on a monthly basis. This will be equivalent to VOC emission of less than 25 tons per year.

(b) Any change or modification in the equipment covered in this permit which may increase the potential to emit to 25 tons VOC per year, shall require the approval of a Best Available Control Technology (BACT) plan, pursuant to 326 IAC 8-1-6, before such change may occur.

D.4.2 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control):

(a) Any change or modification in the equipment covered in this permit which may increase the potential to emit of single HAP and combination of HAPs to more than 10 tons and 25 tons per year respectively, shall require the approval of a Maximum Achieveable Control Technology (MACT) plan, pursuant to 326 IAC 2-4.1-1, before such change may occur.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limit specified in Conditions D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.4 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated at the end of each quarter based on the total volatile organic compound usage for the most recent 12 consecutive month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.5 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

(1) The amount and VOC content by weight of each resin used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(c) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.4.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP/HAPs usage limits and/or the HAP/HAPs emission limits established in Conditions D.4.2.

(1) The amount and HAP/HAPs content of each raw material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted HAP/HAPs content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total HAP/HAPs usage for each month; and

(6) The weight of HAP/HAPs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(d) A new Quarterly reporting form is added as page 44a as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: **J.B. Poindexter & Company, Inc., dba Leer, Inc., dba Leer Midwest**
Source Address: **58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517**
Mailing Address: **58288 Ventura Drive, Elkhart, Indiana 46517**
Part 70 Permit No.: **T039-7561-00097**
Facility: **Reactive Injection Molding Unit**
Parameter: **Volatile Organic Compounds**
Limit: **less than 25 tons per 12 consecutive months period**

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 **No deviation occurred in this quarter.**

9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Conclusion

This permit modification shall be subject to the conditions of the attached Part 70 Minor Permit Modification No. 039-13586-00097.

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Fiberglass Processes

Company Name: **J. B. Poindexter & Company, Inc., dba Leer, Inc.,**
Address City IN Zip: **58228 Ventura Drive, Elkhart, Indiana**
CP: **039-13586**
Plt ID: **039-00097**
Reviewer: **Gurinder Saini**
Date: **11-Dec-00**

Material	Density (lb/gal)	Weight % Monomer	Gallons per unit	Units per hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC per Year	PM tons per year	Emission Factor (Flash off)	Transfer Efficiency
Resin A	8.11	85.0%	5.110000	10.00	7.05	169.08	30.86	0.00	2%	100%
Resin B	8.11	85.0%	5.110000	10.00	7.05	169.08	30.86	0.00	2%	100%
				Totals:	**14.09**	**338.17**	**61.72**	**0.00**		

METHODOLOGY

Potential VOC Pounds per Hour =Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * Emission factor
Potential VOC Pounds per Day =Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor
Potential VOC Tons per Year = Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)
Total = Worst Coating + Sum of all solvents used
Emission Factor for Hand Layup of resin NVS is 10%, VS is 7%, for Spray Layup of resin NVS is 13%, VS is 9%
Emission Factor for Hand and Spray Layup of gelcoat NVS is 35%, VS is 25%
Emission Factors are from AP42, Fifth Edition (January 1995), Table 4.4-2
NVS = Non-vapor supressed resin
VS = Vapor supressed resin